

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF SARAH R. LONDON
IN SUPPORT OF ADMINISTRATIVE
MOTION TO CONSIDER WHETHER
ANOTHER PARTY'S MATERIAL
SHOULD BE SEALED**

I, Sarah R. London, declare:

1. I am an attorney in the law firm of Lieff, Cabraser, Heimann & Bernstein, LLP, appointed Co-Lead counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein

2. Counsel for Uber requested that Plaintiffs' counsel preserve the confidentiality of the materials below:

Document	Description	Designating Party
Plaintiffs' Motion to Enforce PTO No. 2 and to Compel Defendants to Produce Litigation Hold and Preservation Information	Quotes from and references to Exhibits A-D.	Uber
Exhibit A	Letter from Uber's counsel to Plaintiffs' counsel dated 12/1/23.	Uber

Exhibit B	Email from Uber's counsel to Plaintiffs' counsel dated 12/13/23.	Uber
Exhibit C	Letter from Plaintiffs' counsel to Uber's counsel dated 11/22/23.	Uber
Exhibit D	Email from Uber's counsel to Plaintiffs' counsel dated 12/12/23.	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 14th day of December, 2023 in San Francisco, California.

/s/ Sarah R. London
Sarah R. London